USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 6 3 3

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA.

Plaintiff,

-against-

The painting known as "Hannibal" by the artist Jean-Michel Basquiat, from 1982, an acrylic, oil stick and paper collage on canvas, mounted on tied wood, approximately 60 x 60 inches with appraised value of approximately eight million dollars;

The painting known as "Modern Painting with Yellow Interweave" by the artist Roy Lichtenstein, an abstract painting with geometric shapes, including two "half-rings" filled with yellow, with black outlines, and with a black vertical strip dividing the painting in two "halves," signed on the back, with a value of at least approximately one million, three hundred thousand dollars;

The painting known as "Figures dans une structure" [Figures in a structure], by the artist Joaquin Torres-Garcia, signed in the upper left corner, dated in the upper right hand corner, and purchased in 2004 for approximately two hundred thirty thousand dollars;

The painting known as "Composition abstraite" [Abstract composition] by the artist Serge Poliakoff, painted in 1969, an oil painting on burlap, with abstract geometric shapes in red, blue, yellow and brown, approximately 162 x 135 centimeters, sold at auction in 2004 for more than three hundred seventy-eight thousand dollars;

Defendant-in-rem.

08 Civ. 1511(RJS)

STIPULATION & ORDER

The above-captioned matter having come before the Court, and counsel for claimant Broadening-Info Enterprises, Inc. ("Broadening") having requested an enlargement of

time within which to file an answer, move against or otherwise respond to the government's Amended Complaint, and

WHEREAS, on or about February 13, 2008, the government filed a Complaint seeking the forfeiture of the painting known as "Hannibal" by Jean-Michel Basquiat; and

WHEREAS the Court granted Broadening's request to file an extension of time to file a notice of claim until May 2, 2008, and to file an answer, move against or otherwise respond to the government's complaint shall be extended to and including June 2, 2008; and

WHEREAS Broadening filed a notice of claim relating to the painting known as "Hannibal" on May 1, 2008, and was prepared to file an answer, move against or otherwise respond to the government's complaint regarding "Hannibal" on or before June 2, 2008; and

WHEREAS, the government filed an Amended Complaint on or about May 23, 2008, adding numerous additional factual allegations involving three new paintings, including "Modern Painting with Yellow Interweave" by the artist Roy Lichtenstein, "Figures dans une structure" by the artist Joaquin Torres-Garcia; and "Composition abstraite" by the artist Serge Poliakoff (the "Amended Complaint");

WHEREAS, the Amended Complaint was served on Broadening on or about May 27, 2008; and

WHEREAS, Broadening seeks additional time within which to file an answer, move against or otherwise respond to the government's Amended Complaint, and the government anticipates that additional claimants will likely file claims relating to the artwork set forth in the Amended Complaint; and

WHEREAS, the government consents to Broadening's request.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED that,

1. Broadening's time to file an answer, move against or otherwise respond to

the government's Amended Complaint shall be extended to and including June 24, 2008.

Date: June 4, 2008

Thomas E. Butler (TB-5598) Karl H. Buch (KB-5533) Chadbourne & Parke LLP 30 Rockefeller Plaza New York, NY 10112 (212) 408-5100

Attorneys for Claimant BROADENING-INFO ENTERPRISES, INC.

Date: June 4, 2008

MICHAEL J. GARCIA United States Attorney for the Southern District of New York

SHARON E. FRASE (SF-4906) Assistant United States Attorney One St. Andrew's Plaza New York, NY 1007

(212) 637-2329

Attorneys for Plaintiff UNITED STATES OF AMERICA

IT IS SO ORDERED:

Date: June

Hongrable Richard J. Sullivan United States District Judge